

# **EXHIBIT C**

**Benton, Jason R.**

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**From:** Benton, Jason R.  
**Sent:** Wednesday, February 22, 2023 11:10 AM  
**To:** elizabeth@emancipatenc.org; ian@emancipatenc.org; Abraham Rubert-Schewel; Emily Gladden; ndavis@tinfulton.com; 'mll@littlejohn-law.com'; rpettey@ymwlaw.com; apoole@ymwlaw.com; Norwood Blanchard; Kibler, Dottie; Petty, Amy; Leslie Packer; Michelle Liguori  
**Cc:** Dixon, Jessica C.; Marsh, Diana L.  
**Subject:** RE: Yolanda Irving, et al. v. The City of Raleigh, et al.  
**Attachments:** 2023 02 22 Abdullah's Notice of Deposition of David T. Sweeney (P expert).pdf; 2023 02 22 David T. Sweeney, Subpoena.pdf; 2023 02 22 Third Amended Cross Notice of 30(b) (6) Deposition of Emancipate NC Inc. and Rules 30(b)(2) and 34 Request for Production.pdf

Folks-

Attached please find the following:

- Notice and subpoena for the deposition of David Sweeney on March 1 in Seattle, WA. Please note that we are also sending this directly to Mr. Sweeney today (at the address listed on his report) but if Plaintiffs' counsel prefer to accept service we can pivot on that if we hear from you in the next couple of hours. I am in the process of making my travel plans right now. Please note that the 10 am start time on March 1 is PST.
- Abdullah's Third Amended Cross Notice for the Deposition of Emancipate on March 2.

Thank you,

Jason

**From:** Benton, Jason R.  
**Sent:** Tuesday, February 21, 2023 5:36 PM  
**To:** elizabeth@emancipatenc.org; ian@emancipatenc.org; Abraham Rubert-Schewel <schewel@tinfulton.com>; Emily Gladden <egladden@tinfulton.com>; ndavis@tinfulton.com; 'mll@littlejohn-law.com' <mll@littlejohn-law.com>; rpettey@ymwlaw.com; apoole@ymwlaw.com; Norwood Blanchard <norwood@cmclawfirm.com>; Kibler, Dottie <dorothy.kibler@raleighnc.gov>; Petty, Amy <Amy.Petty@raleighnc.gov>; Leslie Packer <leslie.packer@elliswinters.com>; Michelle Liguori <Michelle.Liguori@elliswinters.com>  
**Cc:** Dixon, Jessica C. <jessicadixon@parkerpoe.com>; Marsh, Diana L. <dianamarsh@parkerpoe.com>  
**Subject:** Yolanda Irving, et al. v. The City of Raleigh, et al.

All-

Attached please find attached a Notice of Deposition of Marcus Vanirvin for March 3 at 10:00 am. I have also attached a draft of the subpoena that will go out tomorrow.

Jason